

Exhibit 33

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through
MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY
on behalf of its members, SHAKETA REDDEN,
DORETHEA FRANKLIN, TANIQUA SIMMONS, DE'JON HALL,
JOSEPH BONDS, CHARLES PALMER, SHIRLEY SARMIENTO,
EBONY YELDON, and JANE DOE,
individually and on behalf of a class of all
others similarly situated,

Plaintiffs,

-vs-

CITY OF BUFFALO, N.Y., BYRON B. BROWN,
Mayor of the City of Buffalo, in his individual and
official capacities,
BYRON C. LOCKWOOD, Commissioner of the
Buffalo Police Department, in his individual
and official capacities,
DANIEL DERENDA, former Commissioner of the
Buffalo Police Department, in his individual capacity,
AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI,
ROBBIN THOMAS,
UNKNOWN SUPERVISORY PERSONNEL 1-10,
UNKNOWN OFFICERS 1-20, each officers of the
Buffalo Police Department,
in their individual capacities,

Defendants.

Remote Examination Before
Trial of SHAKETA REDDEN, Plaintiff, taken pursuant to the
Federal Rules of Civil Procedure, at SUE ANN SIMONIN COURT
REPORTING, 421 Franklin Street, Buffalo, New York, taken on
September 6, 2023, commencing at 12:35 P.M., before NICHOLE
WINANS, Notary Public.

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1 APPEARANCES:

2 CENTER FOR CONSTITUTIONAL RIGHTS,
3 By CHINYERE EZIE, ESQ.,
4 666 Broadway,
5 7th Floor,
6 New York, New York 10012,
7 Appearing for the Plaintiffs.

8 HODGSON RUSS LLP,
9 By CHEYENNE N. FREELY, ESQ.,
10 The Guaranty Building,
11 140 Pearl Street, Suite 100,
12 Buffalo, New York 14202-4040,
13 Appearing for the Defendants.

14 PRESENT: Mikaila Hernandez

15 (The following stipulations were entered
16 into by both parties.)

17 It is hereby stipulated by and between counsel
18 for the respective parties that the oath of the
19 Referee is waived, that filing and certification
20 of the transcript are waived, and that all
21 objections, except as to the form of the
22 questions, are reserved until the time of trial.

23 THE REPORTER: Do all parties involved agree to this
deposition being conducted by remote video and to
the witness being sworn in remotely?

MS. EZIE: Yes.

1 MS. FREELY: Yes.

2 SHAKETA REDDEN: Yes.

3

4 S H A K E T A R E D D E N,
5 1410 34th Avenue, Suite 203,
6 Oakland, California 94601,
7 after being duly called and sworn,
8 testified via videoconference as follows:

9

10 EXAMINATION BY MS. FREELY:

11

12 Q. Good afternoon, Ms. Redden. My name is Cheyenne
13 Freely, like you heard before, and I am with
14 Hodgson Russ, and I represent the Defendants
15 today. Before we get into the deposition, I just
16 want to go over some ground rules with you. And
17 first and foremost, have you ever been deposed
18 before?

19 A. No.

20 Q. Okay. Have you ever given any type of sworn
21 testimony before?

22 A. Not that I can recall, no.

23 Q. Okay. So going over a couple rules, for the sake

1 of the court reporter, when we're speaking in
2 normal conversation it'll be normal to say um-hum
3 or um-um, and do head shakes or any kind of like
4 head nods, for the sake of the deposition today,
5 I'm just going to ask that you avoid those and
6 give verbal answers where you can. So yes or no,
7 or explaining the question -- explaining your
8 answer. Can we agree that you will give full
9 verbal answers today?

10 A. Yes.

11 Q. And then, another weird little rule because of
12 the Zoom format of this deposition, it can be
13 easy to talk over one another, but to keep the
14 record clear, let's just agree that we will try
15 not to talk over each other. Can we agree to
16 that?

17 A. Yes.

18 Q. And then if you don't understand a question, just
19 let me know and I will rephrase. Sometimes I can
20 ask questions that can be phrased in a better
21 way, so if you do answer a question without
22 asking me to clarify, I'm going to interpret that
23 as you understanding my question. Can we agree

1 to that?

2 A. Yes.

3 Q. And then, do you understand the difference
4 between a guess and an estimate?

5 A. Can you elaborate on that?

6 Q. Yes. Sure. So a guess is something that you
7 don't really have a point of reference for,
8 right, so, for example, if I were to ask you when
9 is my birthday, you have no point of reference
10 for that, that would be a guess. If I were to
11 ask you how far you're sitting away from your
12 computer right now, you don't have a tape
13 measure, I assume, but you can use your point of
14 reference being that the computer is right in
15 front of you, and that would be an estimate.
16 Does that make sense?

17 A. Yes. That makes sense.

18 Q. Okay. So for throughout the course of this
19 deposition, I might ask you to estimate
20 something, but I never want you to guess. If you
21 have to guess, just feel free to say that you
22 don't know or you don't recall. Can we agree to
23 that?

1 A. Yes.

2 Q. And then a logistical thing, if you have to take
3 a break at any point in this deposition, just let
4 me know, we can take that break. I just ask that
5 if there's a question pending, you answer first
6 and then we can take that break, however long you
7 might need. Does that make sense?

8 A. Yes.

9 Q. Okay. So today your attorney might object to
10 questions that I ask, however, I still need you
11 to answer my question unless your attorney
12 specifically instructs you not to respond. Can
13 we agree to that?

14 A. Yes.

15 Q. And do you have anything in front of you right
16 now relating to this case or anything around you?

17 A. No.

18 Q. Okay. Last couple of preliminary ground rules.
19 Are you currently taking any medications that
20 would affect your ability to give truthful and
21 accurate testimony today?

22 A. No.

23 Q. And is there any other reason why you would

ATTORNEYS' EYES ONLY

9

1 believe that you can't give truthful and accurate
2 testimony today?

3 A. No.

4 Q. Okay. Ms. Redden, what's your date of birth?

5 A. [REDACTED]

6 Q. And --

7 A. [REDACTED] Sorry.

8 Q. Thank you. No. Thank you. And have you ever
9 gone by any other names?

10 A. No.

11 Q. Okay. Have you ever been married?

12 A. No.

13 Q. And do you have any children?

14 A. No.

15 MS. EZIE: Object to the form.

16 BY MS. FREELY:

17 Q. Okay. As for your current address, I know
18 earlier you said you live in Oakland -- or,
19 actually the complaint says you reside in
20 Oakland. What's your current address?

21 MS. EZIE: Object to form. Is this part of the
22 record that Ms. Redden -- or, that counsel could
23 mutually agree designate as confidential to the

ATTORNEYS' EYES ONLY

10

1 extent that Ms. Redden has any sensitivity about
2 her home address being known to law enforcement,
3 for instance?

4 MS. FREELY: Yes. I can completely understand that.
5 Yes, we can agree to that.

6 MS. EZIE: Okay. So, Nikki, can you please designate
7 the question in the transcript confidential as
8 well as Ms. Redden's response.

9 MS. FREELY: I'm going to be asking about her prior
10 residences too, would you like the same
11 stipulation for all of them?

12 MS. EZIE: Yes. Actually, I should clarify, I think
13 we'd like that to be attorneys' eyes only, not
14 confidential, please.

15 MS. FREELY: Okay. That's fine.

16 BY MS. FREELY:

17 Q. Okay. So, Ms. Redden, what is your current
18 residential address?

19 A. 421 Van Dyke Avenue, apartment 4, Oakland,
20 California 94606.

21 Q. And how long have you resided there?

22 A. I actually don't know, maybe two years I think.

23 Q. Okay. Do you remember, did you move straight

ATTORNEYS' EYES ONLY

11

1 from Buffalo to that residence?

2 A. No, I did not.

3 Q. Okay. Where did you live before you lived at
4 your current address?

5 A. I lived in West Oakland. Do you need that
6 address as well?

7 Q. Yes, please.

8 A. I think it was 1510 8th Street, 94607.

9 Q. And then how long did you live there for, if you
10 could estimate?

11 A. I think a little over a year.

12 Q. And for your current residence, do you own or do
13 you rent?

14 A. I rent.

15 Q. For the West Oakland residence, did you also
16 rent?

17 A. Yes.

18 Q. And then prior to your West Oakland residence,
19 what was your address then?

20 A. 50 Greenwood Place, Buffalo, New York 14213.

21 Q. And how long did you live there for?

22 A. Maybe close to four years I think.

23 Q. Okay. And what neighborhood is that in?

1 A. I guess it would be considered the lower West
2 Side.

3 Q. Okay. And did you rent there as well?

4 A. Yes.

5 Q. Okay. So did you grow up in the City of Buffalo?

6 A. Yes. So I grew up in the City of Buffalo, born
7 and raised. I grew up in the East Side of
8 Buffalo, in the like Delavan/Grider area, was
9 where I first lived, and then in the Fruit Belt,
10 which is on the East Side of Buffalo, and then my
11 aunts lived in like, and friends, a lot of my
12 friends lived in the 14215 area, which is like
13 Kensington/Suffolk/Bailey area.

14 Q. And did you regularly visit your aunts and your
15 friends in that area as well?

16 A. Yeah. I mean, I spent the majority of my time in
17 Buffalo on the East Side, because that's where
18 all of my folks are. I worked on the East Side.
19 So yeah, most of my time was spent on -- and my
20 permanent address, my parents' address is on the
21 East Side of Buffalo, so I spent multiple days a
22 week on the East Side.

23 Q. Okay. And that's your current permanent address?

ATTORNEYS' EYES ONLY

13

1 A. No.

2 Q. Okay. Your current, is your current permanent
3 address your Oakland address?

4 A. Yes.

5 Q. Okay. So going back to growing up in the City of
6 Buffalo, what high school did you attend?

7 A. I went to Bennett High School.

8 Q. And remind me of what street that's located on.

9 A. Bennett High School is in like the Central Park
10 neighborhood, although it's on Main Street.

11 Q. And did you graduate from Bennett?

12 A. Yes, I graduated from Bennett.

13 Q. What year did you graduate?

14 A. 2000.

15 Q. Did you attend college after that or work after
16 that?

17 A. I went to UB.

18 Q. And what did you study at UB?

19 A. Studio art, photography, and English.

20 Q. So did you earn a Bachelor's of art?

21 A. Not technically, no.

22 Q. Okay. What did you graduate with, if you
23 graduated?

1 A. I sort of graduated, I mean, I technically I
2 guess I didn't graduate, but like I did my
3 ceremony and stuff, but then I had like an
4 incomplete or something and I never finished, so
5 technically --

6 Q. I see. Okay.

7 A. Yeah.

8 Q. So technically you walked the stage, but you
9 didn't earn your degree, is that correct?

10 A. Yeah. Basically.

11 Q. Or complete it. Okay. So are you pursuing any
12 degrees at the moment?

13 A. No.

14 Q. Do you have any plans to complete your UB
15 education?

16 A. No.

17 Q. Okay. And any plans to do any other higher
18 education in the future?

19 A. No.

20 Q. Okay. And then last question related to your
21 education. Do you have any professional
22 certificates or licenses or credentials?

23 A. No.

1 Q. Okay. So are you currently employed?

2 A. I am.

3 Q. And what is your position?

4 A. Executive director.

5 Q. Where are you an executive director?

6 A. It's an organization called Causa Justa Just
7 Cause, C-A-U-S-A, J-U-S-T-A, and then Just Cause.

8 Q. And where is Just Cause located or where do you
9 work for them?

10 A. In Oakland and in San Francisco.

11 Q. Okay. And do you recall your start date as
12 executive director?

13 A. I became interim executive director May 1st of
14 2021 I believe. And then executive director
15 November of 2021. Yeah.

16 Q. Did you work for the same organization prior to
17 becoming executive director?

18 A. Yes.

19 Q. What was the capacity you worked for them in?

20 A. I had a range of positions. I started as senior
21 lead organizer, then associate director, then
22 deputy director of programs.

23 Q. And with each role, did that come with a pay

1 raise as well?

2 MS. EZIE: Object to form.

3 THE WITNESS: Yes.

4 BY MS. FREELY:

5 Q. Okay. And when you became interim executive
6 director, did you have a pay raise with that new
7 position?

8 A. Yes.

9 MS. EZIE: Object to form.

10 BY MS. FREELY:

11 Q. And with permanent executive director, was there
12 a raise from interim or no?

13 MS. EZIE: Object to form.

14 THE WITNESS: Yes.

15 BY MS. FREELY:

16 Q. Okay. So approximately when did you begin with
17 Just Cause, around what year?

18 A. 2020.

19 Q. Okay. And prior to Just Cause, where did you
20 work?

21 A. Black Love Resists In The Rust.

22 Q. And just doubling back for a second. What year
23 did you walk the stage for UB?

1 A. 2004.

2 Q. Okay. Can we agree to refer to Black Love
3 Resists In The Rust as B-L-R-R for today's
4 deposition as an acronym?

5 A. It's BLRR, so I will refer to it as BLRR.

6 Q. Sure. Okay. I will refer to it the same way.
7 Thank you for that. So when did you start
8 working for BLRR?

9 A. Well, so I am the co-founder and one of the
10 co-executive directors initially at BLRR, and we
11 started out as a caucus called Just Resisting,
12 and we started that approximately like 2013
13 maybe. And so we started -- yeah. Just
14 Resisting as a caucus I think in 2013, and then
15 we didn't formalize BLRR into an organization
16 that spun off from Just Resisting until I believe
17 it was 2016.

18 Q. Okay. And so BLRR, is that based in Buffalo then
19 obviously?

20 A. Yes. It is a Buffalo based organization.

21 Q. And you mentioned you were a co-founder, who else
22 helped found BLRR, helped you found BLRR? Excuse
23 me, sorry.

1 A. Natasha Soto.

2 Q. And do you have any current obligations or duties
3 to BLRR even though you're in Oakland?

4 A. I would say not officially, but I am in contact
5 with BLRR. I also am a contributor to the
6 organization. Yeah. And I recently have been
7 asked to be on the board.

8 Q. And when you say a contributor, what does that
9 entail?

10 A. I give a monthly donation.

11 Q. Okay. A financial contributor then, yes?

12 A. Yes.

13 Q. Okay. So Just Resisting, that was founded in
14 2013. Prior to 2013, what did you do for
15 employment?

16 A. I was the community organizer.

17 Q. Was that for a specific group?

18 A. Yeah. An organization called Voice Buffalo,
19 which is a faith based organizing group, that
20 organized -- I primarily organized on the East
21 Side.

22 Q. And approximately what year did you begin as a
23 community organizer for them?

1 A. I started interning I think in 2012, and then
2 officially started working for them in 2013, so
3 maybe JR started at -- yeah. The end of 2013,
4 2014. So yeah. I started working for Voice in
5 2013 officially. Yeah, I interned for them in
6 2012, and started working for them in 2013.

7 Q. And so did you leave Voice Buffalo to join Just
8 Resisting?

9 A. No. I didn't leave Voice Buffalo to start Just
10 Resisting. Just Resisting started as a caucus
11 space, so we were doing it simultaneously, and it
12 started as a caucus for like black and brown
13 folks to really engage and talk about like things
14 that were happening in the City of Buffalo, like
15 a safe space for folks, and then once we started
16 gaining momentum around that, folks really wanted
17 to like start actually like taking action, and so
18 then that's when we turned it into BLRR, but I
19 didn't stop working at Voice to start Just
20 Resisting. It happened naturally.

21 Q. After you graduated -- well, after you, we're
22 going to say walk the stage, after you walked the
23 stage in 2004, what did you do for employment

1 immediately after school?

2 A. I did a lot of things, I worked for a day care,
3 and then I started working in non-profit work. I
4 worked in an arts organization, an after school
5 arts program. Yeah.

6 Q. Okay. So did you do anything to prepare for
7 today's testimony, and actually before you answer
8 that question, I should have said this earlier.
9 I'll ask you questions like the question I just
10 asked you or did you speak with anyone, questions
11 along those lines, when I ask things like that, I
12 don't want you to talk about contents of your
13 conversations with your attorneys, those are
14 privileged. So I might ask you did you speak to
15 your attorney, and you can say yes or no, but I
16 don't want to know about any of the substance of
17 that conversation. Can we agree to that?

18 A. Yes.

19 Q. Okay. So what did you do to prepare for your
20 testimony today, obviously excluding the content
21 of any conversations with your attorney?

22 A. I reviewed the complaint, as well as reviewed
23 some articles, and had a conversation with my

1 attorney.

2 Q. Yes. Do you recall what articles those were?

3 A. I do not. They were news articles, but I don't
4 recall.

5 Q. Okay. News articles related to this litigation?

6 A. News articles related to our organizing, not
7 specifically related to this deposition or this
8 like complaint specifically.

9 Q. So just BLRR generally?

10 A. Yes.

11 Q. Okay. And then did you speak with anyone about
12 your deposition today other than counsel?

13 A. No.

14 Q. Have you ever spoken with any of the other
15 Plaintiffs in this lawsuit about this lawsuit?

16 A. No.

17 Q. Okay. So I know we talked about before you
18 co-founded BLRR, and you are a contributor, and
19 you might be asked to be on the board. Have you
20 ever been -- when you were co-founder and when
21 you had more of an active role, have you ever
22 been involved in any other lawsuits on behalf of
23 BLRR?

1 A. No.

2 Q. And what were your goals in co-founding BLRR?

3 A. So when we started BLRR, it was the first
4 organization of its type in Buffalo, it still
5 basically is the only organization of its type in
6 Buffalo, and when we started it, like we said we
7 wanted it to be a space for folks of color,
8 specifically black and brown folks, to have space
9 to organize, and I think we were very intentional
10 about how we set up our organizing and
11 organization. One, by who we chose as a fiscal
12 sponsor, but then two, how we intentionally set
13 up our relationship with SURJ Buffalo, basically
14 as a partner organization in the city, and so we
15 basically wanted to set up an organization and a
16 space that folks collectively understood that
17 racism and white supremacy affected us all as a
18 whole, but also be able to organize around, you
19 know, all of the like conservative, racist, white
20 supremacy practices that we saw happening in the
21 City of Buffalo, but also that we heard about and
22 witnessed and experienced personally in the city,
23 and so basically, when we started, our goal was

1 to have an organizing space for black folks, and
2 then soon after that is when we really started
3 talking to folks and folks really started talking
4 to us and telling us about like strike force, and
5 just lots of conversation about harassment from
6 the Buffalo Police Department, and then from
7 then, we knew that like that was the space that
8 we needed to show up in, and really like be
9 organizing around policing and police
10 accountability in the city.

11 Q. So would it be fair to say that the main focus of
12 BLRR is police accountability in the City of
13 Buffalo?

14 MS. EZIE: Object to form.

15 THE WITNESS: No. I don't think it would be fair to
16 say that. BLRR, as a whole, is an organization
17 that is focused on the liberation of black and
18 brown folks in the city. And one of the
19 organizing slash campaign areas in the past and
20 currently has been policing and the
21 criminalization of black and brown folks, but
22 that is not solely the organization's purpose.

23 BY MS. FREELY:

1 Q. Okay. Can you give some other examples of some
2 of those other causes that BLRR organizes around?

3 A. So I would say, right, like -- and this is -- but
4 after the massacre happened in Buffalo, BLRR did
5 a lot of canvassing, door knocking, mutual aid
6 support for families who had been affected by the
7 massacre, right, and so everything -- we had
8 initially organized, we were talking and
9 organizing, bringing light to like Donald Trump
10 coming into the City of Buffalo and how that
11 highlighted racist practices and like our city
12 being hella conservative and right wing in the
13 City of Buffalo. We -- yeah. And there are a
14 bunch of different things, those are just a few
15 to name, but --

16 Q. Yes. And I appreciate the examples. Let's see.
17 Oh, and just for the sake of the record, I know
18 what you're talking about when you referred to
19 the massacre, but when you were just previously
20 testifying about it, are you referring to the May
21 14th Tops massacre?

22 A. Yes.

23 Q. Thank you. Did you have any role in bringing

1 this current litigation?

2 A. Yes, I did. So when we decided to bring this
3 complaint, file a complaint, I was still a
4 co-director and member of BLRR when we decided to
5 do that.

6 Q. And when you say we, was that a board decision,
7 was that something the members voted on, how did
8 that decision play out?

9 A. It was a collective member decision, based off of
10 the fact that we were gathering information also
11 around checkpoints prior. We thought, that being
12 me, Natasha, our members, decided that we should
13 definitely take this on.

14 Q. And when you were gathering that information
15 about the checkpoints, was that by word of mouth,
16 was that going out and looking for them
17 yourselves, how did you gather that information?

18 A. We did -- yeah. Just like we went, we door
19 knocked, went to people in like 14215 area, and
20 yeah. Basically that. Just like canvassing,
21 talking to folks, folks telling us and sharing
22 their stories around their interactions with the
23 BPD, specifically strike force most folks would

1 reference.

2 Q. Can you tell me a little bit about what the
3 mission of Just Cause is?

4 A. Sure. Causa Justa Just Cause is a political
5 project that organizes working class black and
6 brown folks around housing rights, immigrant
7 rights, and racial justice issues in the Bay
8 area.

9 Q. And do you find that your role within Just Cause
10 informs the way you may conduct yourself as a
11 board member, the way you converse with BLRR
12 current board members?

13 A. Can you elaborate or --

14 Q. Yes.

15 A. -- ask it a different way?

16 Q. I can ask it a different way. Do you find that
17 your experience within Just Cause at all helps
18 inform the way that you might contribute to
19 BLRR's efforts?

20 MS. EZIE: Object to form.

21 THE WITNESS: I mean, I think -- so I don't see, I
22 don't see it that like linear. I think that
23 we -- like I have a role to play in a larger

1 movement, and Just Resisting, BLRR, is a part of
2 that, in the same way that CJJC -- I'm going to
3 refer to Causa Justa Just Cause is CJJC just to
4 make it easier. In the same way that CJJC also
5 is a part of the larger movement, and I think I,
6 we, the movement, have specific parts and aspects
7 to play, and I think that BLRR and CJJC are part
8 of the same movement. So I don't necessarily
9 think that, that they're different in that way or
10 that they -- like that what I do here is
11 informing necessarily what I do there, I think
12 that they're connected in a lot of ways.

13 BY MS. FREELY:

14 Q. Understood. And then do you have any other
15 involvement with any other activist
16 organizations, do you have any current
17 involvement with any other activist
18 organizations?

19 A. What do you mean by involvement?

20 Q. Whether it's anything from attending meetings or
21 being a contributor or on the board, any type of
22 involvement.

23 A. Yes. I am a member of Black Feminist Future.

1 Yeah. That's currently it I guess, yeah.

2 Q. And can you describe the mission of that group?

3 A. Black Feminist Future is an organization, it's a
4 national organization that organizes black
5 feminists, whether they are cisgender or
6 transgender, gender expansive folks organizing
7 around issues that face black women locally,
8 nationally, globally.

9 Q. Now since this lawsuit has been filed, have you
10 spoken to anyone, aside from counsel, about the
11 allegations in the lawsuit?

12 A. No.

13 Q. Have you spoken to any media outlets then about
14 the lawsuit?

15 MS. EZIE: Object to form.

16 THE WITNESS: I think the only time I've spoken to
17 media about the lawsuit was the day that we
18 announced it.

19 BY MS. FREELY:

20 Q. And --

21 A. And that was --

22 Q. Sorry. Go ahead.

23 A. I actually don't think I -- I don't actually

1 recall, let me correct that. I can't recall if I
2 spoke to media that day. I remember we had a
3 press conference and I spoke at the press
4 conference, but I don't recall if media
5 specifically asked me questions following that
6 press conference.

7 Q. And so was that press conference the same day
8 that the initial complaint was filed?

9 A. Yes.

10 Q. Now switching gears a little bit. Do you
11 currently have a valid driver's license?

12 A. Yes.

13 MS. EZIE: Object to form.

14 BY MS. FREELY:

15 Q. And is that -- what state is that driver's
16 license issued from?

17 A. So I don't know if you've ever lived in different
18 cities or states, but when you move to a
19 different place, they make you change your
20 license. So I reluctantly now have a California
21 driver's license.

22 Q. Did you receive your first license in New York?

23 A. Yes.

1 Q. And then since receiving your first license, have
2 you always had a valid driver's license?

3 A. Yes.

4 MS. EZIE: Object to form.

5 BY MS. FREELY:

6 Q. Do you own your own car currently?

7 MS. EZIE: Object to form.

8 THE WITNESS: Yes.

9 BY MS. FREELY:

10 Q. How long have you owned that car?

11 A. Since 2014.

12 Q. Okay. And what's the make?

13 A. It's a Volkswagen.

14 Q. And the model?

15 A. Jetta.

16 Q. Do you also recall the year?

17 A. It's a 2012.

18 Q. And when you purchased that, did you purchase it
19 from a dealership or like a used car
20 establishment?

21 MS. EZIE: Object to form.

22 THE WITNESS: I bought it from a dealership.

23 BY MS. FREELY:

1 Q. Okay. Is this the same car that you -- rephrase.
2 Did you used to drive that car in Buffalo when
3 you lived here?

4 A. I did.

5 Q. And then did you own a car prior to the
6 Volkswagen Jetta?

7 A. I did.

8 Q. And how long did you own that car for?

9 A. I think like six years maybe.

10 Q. And what car was that?

11 A. It was a Saab.

12 Q. I'm sorry. You broke up for a second for me.
13 Can you repeat that?

14 A. It was a Saab.

15 Q. Okay. How often have you visited the City of
16 Buffalo in the past year?

17 MS. EZIE: Object to form.

18 THE WITNESS: In the past year, I think just, I don't
19 know, once or twice.

20 BY MS. FREELY:

21 Q. Okay. And then since moving to Oakland three
22 years ago, approximately how many times have you
23 visited the City of Buffalo?

1 A. Oh, my gosh, a lot. Maybe like eight or nine.
2 Quite a bit. I come back to -- I come back at
3 least once or twice a year every year to Buffalo.
4 So yeah. I've been back quite frequently since
5 moving, yeah.

6 Q. During the times that you have visited Buffalo,
7 do you drive from California to Buffalo?

8 A. No.

9 Q. Do you fly?

10 A. Yes.

11 Q. So when you have visited Buffalo, do you drive
12 while you're in the city?

13 A. Yes.

14 Q. And what do you normally drive when you have
15 visited Buffalo?

16 MS. EZIE: Object to form.

17 THE WITNESS: I usually drive my dad's car.

18 BY MS. FREELY:

19 Q. And since moving out of Buffalo, have you been
20 pulled over driving in the City of Buffalo?

21 MS. EZIE: Object to form.

22 THE WITNESS: I don't, I don't -- I actually don't
23 know. I don't recall.

1 BY MS. FREELY:

2 Q. Have you ever -- go ahead. Sorry.

3 A. It's okay.

4 Q. Have you ever received a traffic ticket since
5 moving out of Buffalo in the City of Buffalo --
6 let me rephrase. Since moving out of Buffalo,
7 during your visits, have you ever received a
8 traffic ticket?

9 A. I have not. And can we take a quick break, can I
10 talk to my counsel for a second, is that cool?

11 Q. Yes. Do you want to take like five minutes?

12 A. Yes.

13 MS. EZIE: We can do five, that would be great.

14 MS. FREELY: Okay. So we'll come back here at
15 one-twenty-three, one-twenty-four.

16 THE WITNESS: Okay. Thanks.

17 (Whereupon, a short recess was then taken.)

18 BY MS. FREELY:

19 Q. So we're just coming back from a break, and
20 recognizing that I don't want to know the
21 specific contents of your conversation, did you
22 speak with counsel about your testimony today
23 during that break?

1 MS. EZIE: Cheyenne, respectfully, it's too close to
2 asking about the contents of our conversation.

3 So I'm going to direct Ms. Redden not to answer.

4 MS. FREELY: I am just trying to establish a record.
5 Earlier I asked did she speak with anyone to
6 prepare for this and she did say that she spoke
7 with counsel, that's fine. I'm just asking did
8 she do any further preparation during this
9 deposition to prepare for her testimony. I don't
10 see the difference between the questions.

11 MS. EZIE: That wasn't the question you asked, and
12 maybe ask that question, and I'll see if it
13 sounds less like it's intruding into privilege.

14 BY MS. FREELY:

15 Q. Ms. Redden, did you do any further preparation
16 during this deposition to prepare for your
17 testimony today?

18 MS. EZIE: You may answer.

19 THE WITNESS: Yes.

20 BY MS. FREELY:

21 Q. What did you do to prepare for the deposition
22 during the deposition?

23 A. Spoke with my counsel.

1 MS. EZIE: You may answer without disclosing the
2 contents of any conversations.

3 BY MS. FREELY:

4 Q. Okay. So moving on. Actually, I'm going to
5 backtrack for a second. Have you ever been
6 convicted of any crime?

7 MS. EZIE: Object to form.

8 THE WITNESS: No.

9 BY MS. FREELY:

10 Q. And have you ever been charged with a crime?

11 A. Can you elaborate the question?

12 Q. Yes. So do you understand the difference between
13 being charged with and being convicted of a
14 crime?

15 A. Not -- I'm not sure. Like not specifically, so
16 that's what I'm asking.

17 Q. That's fine. So being charged with a crime is
18 being, in other words, brought up on formal
19 charges or being formally accused of a crime, so
20 you would have been likely detained by police
21 officers, placed in custody awaiting some sort of
22 adjudication of your matters, versus being
23 convicted of a crime, being convicted of a crime

1 is you've been found guilty of that crime or
2 you've taken a plea deal on that crime and you've
3 received some sort of sentence. So have you ever
4 been formally accused of a crime?

5 MS. EZIE: And we're not referring to traffic
6 infractions, is that correct?

7 MS. FREELY: No. Thank you for that distinction.
8 We're not referring to traffic infractions now.

9 THE WITNESS: Yes. I think.

10 BY MS. FREELY:

11 Q. Okay. And do you recall what crime that was?

12 A. I do. So in 2016, I believe a group of BLRR
13 folks and SURJ folks disrupted the mayor's state
14 of the city, and then sat in and then blocked an
15 intersection, and -- yeah. So we took an
16 intersection, and then we were taken into custody
17 and later released, and -- yeah.

18 Q. So we'll come back to this in a second. You
19 mentioned SURJ, am I correct?

20 A. Yes.

21 Q. That BLRR --

22 A. Yes.

23 Q. Okay. What is SURJ, what is that group?

1 A. SURJ is Showing Up For Racial Justice. And I
2 should say SURJ Buffalo, because SURJ is a
3 national organization that, it's white folks
4 organizing white folks around racial justice
5 issues.

6 Q. Okay. And would it be -- rephrase. In your
7 experience, was it common for BLRR to organize
8 with SURJ?

9 A. BLRR and SURJ had an intentional organizing
10 relationship, so we intentionally met leadership
11 team to leadership team monthly to discuss
12 organizing strategies, tactics, campaigns, and so
13 we were very intentional about what made sense
14 collectively for folks to be organizing around.

15 Q. And, to your knowledge, did SURJ Buffalo have any
16 involvement in this lawsuit?

17 A. SURJ Buffalo did not have any involvement in this
18 lawsuit.

19 Q. Switching gears back to you being taken into
20 custody. So were you ever told why you were
21 being taken into custody during this 2016
22 incident?

23 A. They just said that we had to move.

1 Q. Okay. And then have you ever been arrested
2 outside of that incident?

3 A. No.

4 Q. Okay. So if I refer to a traffic safety
5 checkpoint in the City of Buffalo, do you know
6 what I'm referring to?

7 A. I don't -- I don't know what a traffic safety
8 checkpoint is, but I do know what a checkpoint
9 is.

10 Q. Okay. So for the sake of this deposition, I'm
11 going to use the phrase traffic safety
12 checkpoint, and that is going to define the
13 checkpoints discussed in the allegations in the
14 complaint. Can we agree to that?

15 A. I would say that I agree to you calling them
16 safety checkpoints, I don't agree that they
17 actually are traffic safety checkpoints or were
18 traffic safety checkpoints by any means, but yes.

19 Q. Okay. So can you describe your understanding of
20 what these checkpoints were?

21 A. Yes. So these checkpoints basically were, to me,
22 would, you know, the city would call, quote
23 unquote, proactive policing, which basically is

1 racially profiling black folks in the City of
2 Buffalo. So they would set up checkpoints on the
3 East Side, predominantly 14215 area, which is
4 Bailey/Kensington area or set them up close to
5 public housing areas where we know primarily
6 black folks, poor black folks live, and what they
7 would do is they would set up these checkpoints
8 and they would ticket, not only ticket folks but
9 they also would illegally search people's
10 vehicles and try to find like weapons, and then
11 folks would be arrested and potentially convicted
12 because of these checkpoints, and so yeah. They
13 set them up in poor black neighborhoods, and then
14 also used them as like revenue stream for the
15 city. So I wouldn't say by any means that they
16 were for safety, I think they were racially
17 profiled like and set up in communities, black
18 communities in the city.

19 Q. And so do you know if they set up these
20 checkpoints anywhere outside of the East Side of
21 Buffalo?

22 A. So the checkpoints initially, when they started,
23 were set up all over the East Side, all of the --

1 the most of the tickets that were given out
2 through checkpoints were given out on the East
3 Side, were given out on the East Side of Buffalo.

4 Q. So you just said that initially they were all
5 throughout Buffalo, is it your understanding
6 that --

7 A. No.

8 Q. Sorry?

9 A. No. I said -- sorry.

10 Q. No, go ahead. I'm just trying to make sure I'm
11 understanding you correctly.

12 A. Yeah. I didn't say they were throughout Buffalo,
13 I said that checkpoints started in the East Side,
14 and were primarily conducted on the East Side of
15 Buffalo. Majority of the tickets that were given
16 were on the East Side of Buffalo. What I will
17 say is that post community uproar, post BLRR
18 organizing, post interviews and news interviews
19 and articles, I think the BPD tried to maybe
20 sprinkle a few checkpoints throughout the city so
21 they could say that they weren't actually being
22 racist and targeted, and targeting black folks in
23 the city, but I think the data that I'm sure you

1 have shows that checkpoints were happening in the
2 East Side and primarily to black folks, and
3 primarily near BMHA housing.

4 Q. Okay. So just to make sure again that I'm
5 understanding you correctly. It's your -- is it
6 your testimony that the checkpoints began on the
7 East Side of Buffalo and it wasn't until there
8 was more of a community uproar, as you put it,
9 about the checkpoints that they then spread out
10 across the City of Buffalo in other areas besides
11 the East Side?

12 A. I would say that it's not just my testimony, but
13 it is true. And also, I would say that yes.
14 There was a sprinkle, not even more, but like one
15 here, one there, to try to say and justify that
16 they were not racially motivated checkpoints.

17 Q. And everything that you've just testified to
18 about your understanding of what these
19 checkpoints were, is that informed by your own
20 personal experience, experiences you've heard
21 about in the community or anything else?

22 MS. EZIE: Object to form.

23 THE WITNESS: So everything that I have just

1 testified to are, one, from my lived experience
2 as a black woman in the City of Buffalo, who grew
3 up on the East Side, who frequented the East
4 Side, who also was in a checkpoint, but also who
5 has been followed and subsequently harassed by
6 BPD, but also through conversations with
7 community members, BLRR members, through our
8 canvassing activities in our community outreach,
9 how we also heard and/or seen folks actually
10 being pulled over and being harassed by BPD.

11 BY MS. FREELY:

12 Q. Seeing other people being harassed by BPD, is
13 that what -- that's you personally?

14 A. Me. And also, I'm saying we have been in contact
15 and/or seen folks being harassed by BPD, yes.

16 Q. Okay. I just wanted to clarify that point. So
17 on that point, and outside of the allegations in
18 the complaint, can you talk about instances when
19 you've been followed and harassed by BPD, and for
20 the sake of the record, when we refer to BPD can
21 we agree that that stands for Buffalo Police
22 Department?

23 A. Yes.

1 Q. Okay. So let me just repeat my question.

2 Outside of the allegations in the complaint, can
3 you detail instances when you've been followed
4 and harassed by BPD officers?

5 A. Yes. So when I -- in maybe 2013 or somewhere
6 around there, I used to come from the East Side
7 to the West Side often, a few times a week, and
8 literally every time I crossed from East Ferry to
9 West Ferry, right across Main Street, there was
10 literally a cop sitting there and would follow me
11 basically until I got to my street, like and
12 parked my car, and this happened multiple times a
13 week, coming from the East Side to the West Side.

14 Sometimes they would pull me over and just
15 ask me questions about where I was going. One
16 time I like changed a song and they pulled me
17 over and was like you shouldn't be touching your
18 phone while driving. Yeah. So that had happened
19 to me multiple times in the city. There are
20 times just driving through neighborhoods that I
21 would be followed. Yeah.

22 Q. For the 2013 West Ferry to East incidents, do you
23 recall how many times you were pulled over by

1 police in that route?

2 A. I don't recall exactly how many times, but it
3 literally felt like every single day because it
4 happened so frequently to me. And frankly, it
5 was very stressful, because like I would just be
6 trying to drive home, and then would be feeling
7 super anxious that if I did any almost little
8 thing wrong that I would be pulled over or
9 harassed for, yeah, anything.

10 Q. Do you recall if it was the same officer who was
11 pulling you over or the same couple of officers
12 pulling you over?

13 A. I don't recall, no.

14 Q. And did you ever file any complaints with the BPD
15 related to these 2013 West Ferry to East
16 incidents?

17 A. No. I, I would have never thought to file a
18 complaint without honestly the collective unity
19 and force and backing of folks that I'm in the
20 complaint with now, and specifically BLRR,
21 because, you know, I know slash heard of
22 instances of retaliation and I would never want
23 to be subject to that, and so no, I didn't.

1 Q. So is it fair to say that you've never made a
2 complaint to the Buffalo Police Department --

3 MS. EZIE: Object to form.

4 BY MS. FREELY:

5 Q. -- about anything?

6 MS. EZIE: Object to form.

7 THE WITNESS: I don't know that it's fair to say that
8 I've never made a complaint to the Buffalo Police
9 Department, especially considering that we, as in
10 BLRR, took a rack of -- a bunch of people, excuse
11 me, down to police headquarters to actually speak
12 to Commissioner Lockwood, and he would not see
13 us.

14 BY MS. FREELY:

15 Q. So I'll come back to that in a second. Have you
16 ever filed a formal complaint with the Buffalo
17 Police Department on behalf of yourself related
18 to any officer's behavior or any experiences
19 you've had?

20 MS. EZIE: Object to form.

21 THE WITNESS: For a fear of retaliation, I did not
22 file a singular complaint.

23 BY MS. FREELY:

1 Q. Okay. And so moving back to when BLRR organized
2 to go speak to Commissioner Lockwood, when was
3 that?

4 A. I don't recall the exact date, but I believe it
5 was the same day that -- maybe it was 2018. '17
6 or '18, I don't recall.

7 Q. And I know you just mentioned a bit about it, but
8 can you describe what the purpose of that was?

9 A. Yeah. So we wanted to speak to Commissioner
10 Lockwood, we wanted to talk to him about
11 harassment of the BPD, specifically strike force
12 and housing units, and how they were doing
13 hop-outs in the community, and as I referenced
14 before, the so-called proactive policing tactics,
15 and so we wanted to meet with him to talk with
16 him about this and tell him that we wanted it to
17 be shut down.

18 Q. And can you just clarify, did you just say
19 hop-outs or pop-outs? I just couldn't hear that
20 part.

21 A. Yeah. I said hop-outs.

22 Q. And what do you mean when you say that?

23 A. So I think in other cities they would call it

1 like stop and frisk, but basically strike force
2 would just drive around communities,
3 neighborhoods, and if they would see people
4 either walking and/or hanging out, they would, as
5 I said, hop out, like jump out of their cars and
6 like check them, harass them, sometimes, you
7 know, take them downtown.

8 Q. And I just want to ensure that I'm following what
9 you're saying. When you say check them, what do
10 you mean?

11 A. Pat them down, check their pockets, illegally
12 search them.

13 Q. And is any of that based on personal experience
14 or is that again what you've heard your members,
15 what the BLRR's members have gone through?

16 A. It's based off of testimony of community members
17 and also I have seen it happen.

18 Q. And when you say testimony, is that sworn
19 testimony in another case or something else?

20 A. No. I just mean conversations or stories
21 collected slash outreach.

22 Q. Okay. Going back to going to see Commissioner
23 Lockwood specifically, what were you told when

1 you walked into the BPD headquarters?

2 A. They, first they asked us to wait, then they said
3 that he wasn't there, and we told them we would
4 wait until he got back.

5 Q. And so did you wait?

6 A. We did. Until some officers came out and
7 basically started harassing us and told us that
8 we had to leave or we would be arrested.

9 Q. And when you say harassing you, can you give me a
10 little bit more detail on that?

11 A. So we were standing in the lobby, and slash
12 sitting in the lobby, some police officers came
13 out from the back, wherever they were, and
14 started telling us that we had to leave, and, you
15 know, we said that we were waiting to meet with
16 Commissioner Lockwood and that we didn't have to
17 leave, and then basically they started walking
18 towards us and told us that we needed to leave,
19 and if we didn't, they would arrest us, and we
20 said that we didn't have to because it's the
21 headquarters, and we can stay there if we wanted
22 and we were waiting. And then they just seemed
23 like they got a little bit more -- you know, they

1 were angrier, and basically kind of like since we
2 were not listening to them, they really were
3 going to arrest us, and we hadn't planned for
4 that, so we left.

5 Q. Prior to going to BPD headquarters, did you ever
6 call BPD headquarters or write any type of --
7 have any kind of communication with BPD to
8 complain about BPD treatment?

9 A. So we released a statement saying what we wanted
10 to happen, but as I said before, as it pertains
11 to me personally, because I fear retaliation, I
12 did not personally submit or file a complaint to
13 BPD.

14 Q. Right. And I'm not talking about complaints
15 specifically to BPD like formally, but statements
16 along the lines like you were talking about, so
17 was that statement issued by BLRR generally?

18 A. Yes.

19 Q. And how was that publicized?

20 A. The news. And also it was printed and it was
21 sent over to BPD.

22 Q. Okay. And you also mentioned that you have been
23 followed driving I believe, correct?

1 A. Yes.

2 Q. Okay. Can you recall instances when you've been
3 followed by BPD?

4 A. So I think on top of what I've already told you,
5 there was one other time that I was followed, and
6 it was raining, and basically two officers
7 followed me all the way to -- I was parking, and
8 it was raining, and I was parking my car, I
9 couldn't really see that well in the rain, and I
10 like -- they were like -- I was trying to park
11 and they literally were sitting next to where I
12 was trying to park, and staring at me, and I felt
13 super anxious and intimidated, because they were
14 just there, like kind of lurking, and then I
15 started to back into a parking spot, and -- yeah.
16 Like I said, I was anxious, and I like tapped the
17 car behind, like behind where I was parking, and
18 then the officer like was staring at me, and told
19 me to roll down the window, and then started
20 questioning me, asked me where I was going, I
21 said home, asked me where I lived, if that was my
22 car. Did I see that I had tapped the person
23 behind me, did I know whose car that was, like

1 just questioning me all of these questions.

2 Yeah. And it was -- yeah. It was ridiculous and
3 scary, and a lot.

4 Q. And so how did that resolve?

5 A. Then they just drove away, and then circled the
6 block again to see if I was still there or
7 sitting there and then like drove off again, and
8 then I was like hella nervous so I just went in
9 the house.

10 Q. And so you were parking -- were you parking on
11 the street outside of your house?

12 A. I was parking on the street like across the --
13 parking on the public street across the street
14 from where I lived.

15 Q. Okay. And you said that they were --

16 A. They followed me a ways.

17 Q. Okay. Before you had parked?

18 A. Before I had parked.

19 Q. And then after you parked, did they pull up next
20 to you?

21 A. They were already lurking, sitting next to where
22 I was, like watching me park.

23 Q. Okay. Shifting gears a little bit back to our

1 checkpoints that we were talking about. So how
2 many times in total have you been through a
3 checkpoint in the City of Buffalo?

4 A. Once.

5 Q. And is that the instance that you detail in your
6 complaint?

7 A. Yes.

8 Q. Okay. Let's see. Just give me a minute here
9 while I try to share my screen. Do you see a
10 court document in front of you, BLRR amended
11 complaint?

12 A. Yes. Can you make it bigger?

13 Q. Yes. Of course.

14 MS. EZIE: Cheyenne, for the record, are you going to
15 mark this as Exhibit 1 for this deposition?

16 MS. FREELY: Yes.

17 BY MS. FREELY:

18 Q. Okay. So, Ms. Redden, if you just want to read
19 the lines to yourself that I have pulled up here,
20 I'm going to scroll a little bit, so let me know
21 when you're done with paragraph three
22 forty-seven.

23 A. Okay.

1 Q. And then if you just want to read for me through
2 the end of the page. Three forty-eight through
3 three fifty-one as well.

4 A. Okay.

5 Q. Okay. So is this an accurate representation of
6 the checkpoint incident that you just mentioned
7 to me previously?

8 A. Yes.

9 Q. And do you remember the name of the officer who
10 -- or, the officers who wrote you a ticket during
11 the checkpoint?

12 A. I do not recall.

13 Q. Was anyone else in the car with you when you went
14 through that checkpoint?

15 A. No.

16 Q. And can you describe for me in your own words
17 what happened here, can you set up the scene for
18 me, for lack of a better phrase?

19 A. Sure. So I was on the 33, I was going like
20 north, getting off at the Suffolk exit, and
21 usually there isn't like that much traffic, so it
22 felt like unusual for it to be backed up, and I
23 actually really didn't know what was happening,

1 but the exit was backed up, and then I was trying
2 to like see what was going on, and that's when I
3 saw that there was a checkpoint. And at that
4 point I had like seen them, and like I have heard
5 about them but I hadn't experienced one, so it
6 made me hella anxious to like go through it, and
7 I just remember seeing people, a lot of people,
8 being pulled over, the cops like looking into
9 people's cars, and then they got -- when they got
10 to me, they asked me where I was going, I told
11 them I was going to get my hair done, and they
12 looked at my inspection sticker, as I stated, and
13 then they also like looked in the back of my car,
14 and then they wrote me a ticket, and then they
15 said I could go.

16 Q. And what was that ticket for?

17 A. Inspired (sic) registration I believe -- or,
18 inspection.

19 Q. Okay. And so --

20 A. Inspection.

21 Q. I'm sorry. In the complaint, it alleges that
22 there were a long line of cars ahead of yours.
23 Do you remember approximately how many cars there

1 were?

2 A. I don't recall.

3 Q. Okay.

4 A. I just remember it being like backed up.

5 Q. Okay. And then paragraph three forty-seven
6 states that the officers had stopped
7 approximately four cars in front of yourself, and
8 there were several behind you. Do you know, do
9 you recall if it was four cars at first that were
10 ahead of yours or had that line dissipated by the
11 time it got to four cars?

12 A. No -- wait. Can you say that one more time?

13 Q. Yes. Yes. So the complaint alleges that there
14 were four cars ahead of yours and that there were
15 several behind you. Do you recall, when you
16 pulled up to the checkpoint at first, were there
17 four cars ahead of you or were there more cars
18 ahead of you and they got through the checkpoint?

19 A. I don't recall.

20 Q. Okay. And I know you set the scene for me a
21 little bit, but can you describe, was the
22 checkpoint line a straight line or was it curved
23 at all?

1 A. It was, it was straight. Well, it was -- I can't
2 really say it was straight. It was kind of
3 straight and curved, because the way that the
4 exit is, so it was like you're coming and it's
5 straight, but then it's going to veer off because
6 you're trying to, you're trying to go out of, to
7 the exit, trying to get off of the expressway.

8 Q. Okay. I get what you're saying. So with the
9 four cars that were ahead of you at a certain
10 point in time, could you see inside those cars at
11 all, into the windows?

12 A. I could see the cops talking to folks, and I
13 believe the car ahead of me I could see, but --
14 yeah.

15 Q. Okay. So fair to say you could see the cops
16 ahead of you, and then you could see the person
17 in front of you?

18 A. Yes.

19 Q. Okay. Could you tell if any of the drivers of
20 the four cars in front of you were white drivers?

21 A. I recall that they weren't.

22 Q. Okay. So could you see through the windows of
23 all four cars in front of you?

1 MS. EZIE: Object to form.

2 THE WITNESS: I couldn't see through all four cars in
3 front of me, but I do recall in some instances
4 like the way that I was able to like go, some
5 people were even pulled over.

6 BY MS. FREELY:

7 Q. Can you elaborate on that a little bit more, so
8 are you saying --

9 A. Like I was stopped, I was stopped in a lane, and
10 like stopped towards the exit, but then some
11 people were told that they needed to pull over,
12 so like they weren't allowed off of the exit.
13 They had to pull over near like the -- what is
14 that thing called.

15 Q. Like the shoulder of the road?

16 A. Yeah. There you go, the shoulder.

17 Q. Okay.

18 A. And so yeah.

19 Q. Okay. And so when you got up to the checkpoint,
20 and when I say up to the checkpoint, I mean when
21 you got up to the officers, could you see inside
22 the cars that had been pulled over to the
23 shoulder of the road?

1 A. Yes.

2 Q. Okay. And at that point in time were you able to
3 identify the races of the people who had been
4 pulled over?

5 A. Yes.

6 Q. Okay. And what race were they, what races?

7 A. They were black.

8 Q. Okay. But while you were waiting in that line
9 and you had the four cars ahead of you, could you
10 tell if there were any drivers of any other races
11 in those four cars ahead of you?

12 MS. EZIE: Object to form.

13 THE WITNESS: I don't recall, like I don't know.

14 BY MS. FREELY:

15 Q. So rephrasing a bit. Do you remember if you
16 could identify the race of the first car in line
17 when you came to the checkpoint line?

18 MS. EZIE: Object to form.

19 THE WITNESS: What I'm saying is I don't remember
20 like -- I don't remember crystal clear if I could
21 see that the person in the fourth car in front of
22 me was --

23 BY MS. FREELY:

1 Q. You can finish your answer.

2 A. Okay. Was a black person, but what I do recall
3 is, one, feeling hella terrified, and two, I
4 recall a lot of black people, a lot of black
5 folks being pulled over. And then also just
6 feeling like -- I also remember feeling hella
7 sad, because, one, I had just gotten a ticket and
8 I didn't know how I was going to pay for it, so I
9 could only imagine, you know, other folks, and
10 then also seeing that folks were like actually
11 pulled over, made me like even more afraid, and
12 like anxious for folks.

13 Q. So is it fair to say that you couldn't tell
14 whether or not there were drivers of any other
15 race besides black in all of the cars in front of
16 you?

17 MS. EZIE: Object to form.

18 THE WITNESS: Can you repeat the question?

19 BY MS. FREELY:

20 Q. Yes. So is it fair to say that in the four cars
21 ahead of you, you could not tell whether those
22 individuals -- you could not tell the races of
23 those drivers in those four cars ahead of you?

1 MS. EZIE: Object to form.

2 THE WITNESS: Yeah. So, like I said, I couldn't -- I
3 don't recall actually like seeing through all
4 four cars, but I do remember seeing that like a
5 bunch of black folks were pulled over.

6 BY MS. FREELY:

7 Q. Yes. So as for those pulled over cars, do you
8 remember if you saw any of them step out of the
9 car?

10 A. I believe so.

11 Q. So did anyone step out of their cars when they
12 were pulled over?

13 A. Yes. I believe so. But this was -- yeah. A
14 really long time ago, but based off of my
15 recollection, yes.

16 Q. Okay. And acknowledging that this was a long
17 time ago, and I appreciate you giving thoughtful
18 answers, do you remember how many, approximately
19 how many people you saw who had stepped out of
20 their car?

21 A. I don't.

22 Q. Okay.

23 A. I'm thinking at least, at least two cars, but,

1 like I said, it was a very long time ago, and I
2 don't want to like lie or you know --

3 Q. Right. I don't want you to lie, I don't want you
4 to guess, as we talked about before.

5 A. Yeah.

6 Q. But based on your memory, what you can recall is
7 what I'm asking of you.

8 A. Um-hum.

9 Q. So you can recall that two individuals had
10 stepped, two drivers had stepped out of their
11 cars?

12 A. Yes.

13 Q. Okay. Understood. So as for the ticket that you
14 were issued during that checkpoint, were you
15 aware that your inspection had lapsed?

16 A. No. I was not aware that my inspection had
17 lapsed. I wouldn't have been driving had I known
18 or I would have gone to get it inspected.

19 Q. And did you have any kind of normal custom or
20 normal practice to make sure that your inspection
21 and your registration and your vehicle upkeep was
22 done, did you calendar anything?

23 MS. EZIE: Object to form.

1 THE WITNESS: No. I didn't really calendar anything,
2 but I, you know, generally would just make sure
3 that I would get it done annually.

4 BY MS. FREELY:

5 Q. And do you --

6 A. And as far as registration -- sorry. And as far
7 as registration, you get an e-mail when it's
8 going to go up.

9 Q. When it's about to expire?

10 A. Yeah. For your registration you get an e-mail a
11 few months before. So generally for me, I mean,
12 a registration is every two years, but it's just
13 like I generally know, usually would know what
14 time of year that I would have to reinspect or,
15 you know, or reregister.

16 Q. And do you think it's, regardless of notification
17 e-mails, do you think it's your responsibility as
18 a driver to keep track of those dates?

19 MS. EZIE: Object to form.

20 THE WITNESS: I mean, I think, yeah. I think it's
21 every driver's responsibility to keep up-to-date
22 with when they, you know, their inspection and
23 registration is up, but I also think that because

1 we are humans and things happen, that we should
2 also be able to be allotted a grace period for
3 potential mishaps.

4 BY MS. FREELY:

5 Q. So do you think in the instance of the ticket you
6 were issued for the checkpoint, that there should
7 be some sort of grace period?

8 A. Yes. I think had the city not been using tickets
9 as revenue, revenue income, then potentially
10 there would have been a grace period.

11 Q. And do you think that grace period should be
12 implemented by the state or be implemented by the
13 Buffalo Police Department themselves?

14 MS. EZIE: Object to form.

15 THE WITNESS: I don't, I don't know that I understand
16 the question.

17 BY MS. FREELY:

18 Q. Yes. So by law, a car is required to have their
19 inspection and their registration up-to-date. Do
20 you think that New York State should change the
21 law to allow for a grace period or do you think
22 that the Buffalo Police Department should just
23 turn a blind eye and practice some sort of grace

1 period?

2 MS. EZIE: Object to form.

3 THE WITNESS: Yeah. I mean, that's an interesting
4 question, right, I don't necessarily think that,
5 that the BPD should be trying to change all of
6 these laws, per se, but what I do know is that
7 because BPD and their practices are instructed to
8 use tickets as a revenue stream for the city,
9 then there is no sort of grace period that would
10 even be allotted in general, so I don't know
11 whether it should be a state ruling, but I also
12 know that if you are told that you have to do a
13 certain thing, and that this is going to impact
14 revenue, also if you know that you have to, when
15 you give a ticket, you have to show up to court,
16 that also impacts overtime and inflates your
17 salary, then you're not going to necessarily just
18 say like, oh, I understand, and, you know,
19 something may have happened, you're going to
20 actually inflict, right, this ticket onto a
21 person, because it impacts not only just the
22 bottom line of city revenue, but also the bottom
23 line of your income.

1 BY MS. FREELY:

2 Q. And so you mentioned that BPD officers are being
3 told to write tickets in order to help the city's
4 bottom line and generate revenue, how do you know
5 they're being told that?

6 MS. EZIE: Object to form.

7 THE WITNESS: How do I know that they are being told
8 that, I read something somewhere that posted, I
9 believe 2012, that the money for tickets was no
10 longer going to the state and it was coming to
11 the city.

12 BY MS. FREELY:

13 Q. So are you inferring that because that change was
14 made, higher-ups at BPD have told officers to
15 issue more tickets?

16 A. I am saying that it is the city practice, whether
17 it was higher-ups at BPD, whether it was the
18 mayor, whether, whomever it was, it was a city
19 practice.

20 Q. So I just want to make sure that I'm
21 understanding. You read an article or something
22 that said revenue from tickets was now being
23 directed to the City of Buffalo, and not New York

1 State, correct?

2 A. Yes.

3 Q. And so what specifically from that, that thing
4 that you read, led you to believe that it was now
5 a policy or a directive that BPD officers should
6 issue tickets?

7 A. Well, post that is when checkpoints started, it's
8 when there was an increase in tickets, it was
9 when folks started getting multiple tickets at a
10 time, so there was a shift in what was happening
11 in the city.

12 Q. So is it an inference based on this shift you
13 noticed in the city, and what you read, that this
14 was the policy coming from the BPD, to issue more
15 tickets to generate more revenue?

16 MS. EZIE: Object to form.

17 THE WITNESS: I also think that there is somewhere,
18 and I can't recall from where, that there was an
19 admittance that this is actually true, that the
20 city was counting on this money for the budget.
21 And I actually don't recall if that was through
22 like our budget work, but I do recall that being
23 true.

1 BY MS. FREELY:

2 Q. Okay. Do you think it's unconstitutional for
3 officers to write tickets for violations that
4 they see if it's going to the city's revenue?

5 MS. EZIE: Object to form. And I'm avoiding speaking
6 objections, Cheyenne, but I'm not sure it's
7 appropriate to ask this witness like legal theory
8 questions, but --

9 MS. FREELY: I wouldn't define that as a legal theory
10 question, but I can rephrase.

11 BY MS. FREELY:

12 Q. Do you think that it's unjust for officers to
13 write tickets for traffic infractions
14 specifically, if they go to the city's revenue?

15 A. I don't, I don't necessarily think that I would
16 say that it is unjust for officers to potentially
17 give tickets if they see something. What I do
18 think is unjust is for officers to create that
19 scenario, I think it's unjust to create
20 checkpoints that people have to drive through in
21 order to increase said revenue, or if someone is
22 pulled over for something, adding additional
23 tickets to a person to increase revenue.

1 Q. Okay. So just so that I'm understanding. If
2 someone was pulled over because their inspection
3 was expired --

4 A. Sorry, go ahead.

5 Q. If someone was pulled over for their inspection
6 being expired or say they were missing a license
7 plate, something like that, is it your position
8 that the officer should not ticket any other
9 violations they see or no?

10 A. Well, I would say, number one, it is highly
11 unlikely for an officer to see a person's
12 inspection sticker is expired just randomly,
13 right, like, an officer would have to have an
14 actual reason to pull a person over to even see
15 that their inspection sticker is expired. So
16 what I'm saying is it is unjust to set up a
17 scenario for people to be given tickets. Like it
18 is unjust to set up checkpoints and have people
19 go through them, so that you can identify what
20 someone is doing wrong prior to someone even
21 doing it. So if like based off of what you just
22 said, if I am driving, there's no real way for an
23 officer to see if my inspection sticker is

1 expired, so there would be no reason for an
2 officer to pull me over, so I'm saying it's
3 unjust to creat a scenario where you have to pull
4 all these folks over.

5 Q. Okay. I understand that part of your testimony,
6 thank you for clarifying. But in the instance
7 of, say, a person was missing license plates and
8 they were pulled over, is it your position that
9 the officer should not issue any other traffic
10 tickets for any other violations they see on the
11 car?

12 A. What I'm saying is I think that folks were adding
13 additional tickets to increase revenue. So if
14 someone is pulled over for a particular
15 violation, but then you give a ticket because a
16 license plate bracket is broken, I think that
17 that, to me, is like inappropriate or unjust.
18 Like I just don't -- I can't understand a way
19 that that would actually be just when you are
20 actively pulling over folks in poor neighborhoods
21 and increasing revenue. I just can't see that.

22 Q. And I should have clarified this from the
23 beginning. But when we use the term unjust, when

1 it was used in the complaint and when you're
2 using it today, how would you define the term
3 unjust?

4 A. To me, it is something that, it's something that
5 is generally unfair, routed in some level of
6 prejudice or discriminatory practice or in some
7 regard -- yeah. Just something that is done
8 unfairly, I guess.

9 Q. Okay. So in your opinion, if something is
10 unjust, can it still be legal?

11 MS. EZIE: Object to form.

12 THE WITNESS: I mean, I think that that is a hard
13 question, right, there are lots of things that
14 are hella legal that are unjust, so -- and I
15 wouldn't want to -- yeah. I just, I can't agree
16 with that. You know -- sorry, I just got a text
17 message on my screen.

18 Yeah. Lots of things are legal I think that
19 are unjust, right. So I can't, I can't say that,
20 right, like -- yeah. Like once, once folks could
21 no longer be owned, right, they could be picked
22 up if they were vagrants or like didn't have a
23 license and could be arrested, like that is very

1 unjust but still legal. So I can't really
2 reconcile the two of those things, I think in the
3 way that you would like me to answer it.

4 BY MS. FREELY:

5 Q. No. I definitely don't want you to answer in any
6 particular way, and I don't want you to answer
7 based on what you think I want. Answer
8 truthfully, answer to what you think your truth
9 is, and that's why we're here today. All that
10 being said, I have a portion left, but is
11 everyone amenable to another five-minute break
12 and then we'll get through the rest of what we
13 have to get through?

14 MS. EZIE: Can we make it a ten-minute break?

15 MS. FREELY: Yes. Sure.

16 (Whereupon, a short recess was then taken.)

17 BY MS. FREELY:

18 Q. Ms. Redden, were you on this -- during this
19 September 9th checkpoint incident, were you ever
20 arrested?

21 A. No.

22 Q. Were you ever asked to step out of the car?

23 A. I don't believe so, no.

1 Q. And can you describe your interaction with the
2 officer who pulled you over to the shoulder of
3 the road?

4 A. Yeah. He asked me where I was going, I told him.
5 He asked me for my license and registration, I
6 gave it to him. And then he, like I said, looked
7 in my window, the front window, and then he
8 looked like in the back seat of my car, which I
9 don't know why, but that's what he did, and then
10 he I guess like ran my stuff, and then he came
11 back and gave me a ticket and said that my
12 inspection sticker was expired, and he gave me a
13 ticket.

14 Q. Okay. And was he ever unprofessional during that
15 interaction or rude?

16 MS. EZIE: Object to form.

17 THE WITNESS: I don't recall if he was rude or, quote
18 unquote, unprofessional. Yeah.

19 BY MS. FREELY:

20 Q. Okay. And I am going to bring back up Exhibit A,
21 which is the operative amended complaint in this
22 action. Okay. Can we all see, starting with
23 paragraph three fifty-two, Ms. Redden, I'll

1 scroll down, can you read from three fifty-two
2 through three fifty-eight to yourself. I'll
3 scroll down when you need me to.

4 A. Okay. Okay. You can scroll up.

5 Q. Okay.

6 A. Okay.

7 Q. Okay. So is this an accurate account of what
8 we'll call the September 13th incident in 2018?

9 A. Yes.

10 Q. Okay. And paragraph three fifty-seven discusses
11 how the judge dismissed all the tickets because
12 Ms. Redden had already renewed her vehicle
13 registration. Do you see that?

14 A. Yes.

15 Q. And do you see in paragraph three fifty-four
16 discussing how you were issued a ticket for
17 having a dirty license plate?

18 A. Yes.

19 Q. Did the judge dismiss that ticket as well?

20 A. No. And also, the judge didn't dismiss all of my
21 tickets, because I had to pay like twelve hundred
22 dollars to get everything taken care of.

23 Q. Okay.

1 A. I had to borrow the money from my brother.

2 MS. EZIE: Cheyenne, just to make a record of this.

3 I think I learned for the first time maybe last
4 week that we had misstated the number of tickets
5 that had been dismissed, so I want to own up to
6 the fact that I believe three fifty-seven was
7 written in error, and that only a portion of the
8 tickets were dismissed.

9 MS. FREELY: Okay. Well, we can clarify right now.

10 BY MS. FREELY:

11 Q. So which tickets from your recollection were
12 dismissed? Sorry. I'm talking to Ms. Redden.

13 A. I believe the registration tickets, but yeah. I
14 believe the registration ones were dismissed.
15 But I also will say that I know that like I would
16 just randomly get tickets a lot in general. So,
17 you know, the twelve hundred dollar -- yeah.
18 I'll stop there, but the registration ones were
19 just dismissed.

20 Q. Okay. We'll come back to the point you just
21 made. But just to clarify, so we're talking
22 about the two tickets for driving while
23 registration was suspended, and expired

1 registration, so three tickets in total were
2 dismissed, correct?

3 A. Yes.

4 Q. Okay. And then the two tickets for failure to
5 notify the DMV of a change of address, and the
6 dirty license plate remained, and those were the
7 ones that you had to pay the fines on, correct?

8 A. Yes.

9 Q. Okay.

10 A. I believe so, yes.

11 Q. So what, related to the September 13th incident,
12 what led you to believe that you were racially
13 profiled on that day when you were pulled over?

14 A. So we were leaving, Natasha and I were leaving,
15 as it says in the thing, a vigil for Pito Rivera
16 on the lower West Side, and literally we were
17 leaving the vigil and all of the press was
18 talking about how this guy was murdered by BPD
19 strike force, and driving home, driving to drop
20 Natasha off, literally as soon as I dropped her
21 off at the stop sign, I saw a cop following me
22 like behind me, and I knew, I just knew that I
23 was going to be pulled over, because he was

1 following me, and also because of where we had
2 come from, coming from a vigil and like press
3 conference that was literally saying that BPD and
4 strike force were racist and had murdered
5 multiple people. We had already been organizing
6 and talking about the fact that this was like BPD
7 had killed two other young men of color prior to
8 this incident, and so, to me, it made me a target
9 for retaliation in general, and so I felt like
10 nervous and anxious I was going to be pulled
11 over.

12 Q. And so just so that I -- well, one thing to
13 clarify. When you say Natasha, are you referring
14 to Natasha Soto?

15 A. Yes.

16 Q. Okay. Thank you. So do you think that the
17 officer followed you from the vigil, what makes
18 you think that the officer knew you were coming
19 from the vigil?

20 A. I do think the officer followed me from there.

21 Q. Okay. Did you see him following you from the
22 vigil to Natasha's house?

23 A. I didn't realize him until I got to Natasha's

1 house.

2 Q. Until after you dropped her off, correct?

3 A. Yeah.

4 Q. Okay. And did, so just as a reminder, it was,
5 according to the complaint, BPD Officer Charles
6 Skipper who pulled you over, can you recall if
7 Officer Skipper said anything racist or rude that
8 led you to believe that he was racially profiling
9 you?

10 MS. EZIE: Object to form.

11 THE WITNESS: So I don't believe that he said
12 anything racist to me in particular, but I don't
13 think it's far off to assume that there was
14 racial intent. I don't think you'd necessarily
15 have to say a racist thing to be racially
16 profiling someone. And also, I do recall him
17 being rude and dismissive in general.

18 BY MS. FREELY:

19 Q. Can you describe a little bit more of that in
20 terms of what he said that you thought was rude
21 and dismissive?

22 A. Yeah. Every time I tried to ask him a question
23 or explain something to him, he kind of like

1 would cut me off or shut me down. I asked him
2 questions, and he sort of chuckled and was like
3 well, that's not how any of this works or that's
4 not how this works. Yeah. And I would try to
5 ask him questions and he would just be like short
6 with me and kind of like you should know, like I
7 was just supposed to have this information
8 intuitively kind of.

9 Q. And is the information you're referring to the
10 reasons for his -- for those tickets?

11 MS. EZIE: Object to the form.

12 THE WITNESS: No. Like he said well, your car is
13 going to be towed, and I was just like well, what
14 does that mean, where is it going, like how do I
15 get my car back, and he kind of just was like
16 well, it's going to the tow lot, and I was like I
17 don't, I don't know what, you know, I don't know
18 what that means, you know, like I was just trying
19 to ask him questions about the whole thing, and
20 he sort of was really like dismissive.

21 BY MS. FREELY:

22 Q. So would you say you were asking him questions,
23 more logistical questions about next steps from

1 here and what happens?

2 A. Logistical questions, I tried to tell him that my
3 registration wasn't suspended, that I didn't get
4 any notice of my registration being suspended.
5 He asked me -- he said something about my
6 address, I told him what my address was, and he
7 said well, that's not the address that we have,
8 you need to go change your address at the DMV,
9 and I said this is the only address that I have
10 filed with the DMV, is the address that's on my
11 license, and he said well, that's not the
12 information that we have here, and I said well,
13 if that is the case, like what, I asked what
14 address did he have, and he said we have some
15 like Elmwood address, and I was like that is
16 not -- like that hasn't been my address for
17 multiple years. I also have never put that on
18 any of my DMV documentation because that's not my
19 permanent address, and he sort of was just like,
20 you know, kind of like whatever, that's what we
21 have here, so you need to go to the DMV to change
22 it.

23 Q. And so just so that I understand, was there only

1 one address on your license, and by that I mean,
2 sometimes when people move they can write the new
3 address on the back of their current license
4 before they go change it with the DMV, did you
5 only have the one printed, pre-printed address on
6 your license?

7 A. Yeah. I never changed my address because my
8 parents' address is my -- was my permanent
9 address the whole time I lived in Buffalo, for
10 this particular reason. Just so like if anything
11 official or like, you know, from the city or
12 whatever, would go there, so I never had any
13 other address on my license.

14 Q. And so the Elmwood address that he was
15 referencing, was that a previous address that you
16 had lived at?

17 A. It is, but I don't even know how he got that
18 address, and I tried to ask him that and he just
19 was like well, that's what I see right here.

20 Q. Okay. And you didn't live there at the time you
21 were being pulled over, correct?

22 A. No. I hadn't lived there in multiple years.

23 Q. Okay. Just wanted to clarify that point. So

1 then according to the complaint, you went to the
2 DMV and the DMV confirmed that they had the
3 correct address on file for you, is that correct?

4 A. Yes.

5 Q. So did you bring this up to the judge when you
6 went for your hearing on these tickets?

7 A. Yes.

8 Q. Do you remember what judge you were in front of,
9 by the way?

10 A. I don't.

11 Q. It's okay. Did the judge -- what was the judge's
12 response to the DMV having the correct address?

13 A. Nothing really.

14 Q. And so when you say nothing, that's because that
15 ticket --

16 A. No. I think just because -- I don't think that
17 they, I don't think that they care.

18 Q. And by they, you mean the judge?

19 A. Yeah.

20 Q. Okay.

21 A. I think, you know, it was like sort of like a
22 non-thing, like oh, well, that didn't matter, and
23 you paid your registration, so it's fine sort of

1 a thing, like kind of like a non-issue or like an
2 afterthought sort of a thing.

3 Q. So do you feel that the judge should have
4 dismissed your change of address tickets, the two
5 tickets that were issued for the change of
6 address?

7 A. I, I don't know. Like I don't want to, you know,
8 I don't want to say that, you know, the judge
9 should have done this or the judge should have
10 done that, I feel like -- I feel like, right,
11 there was no real reason for the cop to pull me
12 over unless he was following me and then randomly
13 ran my tags for whatever reason, no reason I
14 would say, and then I was pulled over and
15 ticketed, so I don't -- you know, I don't know.
16 I don't want to say that the judge should have
17 done this or should have done that, but I feel
18 like the whole thing was really messed up, and
19 just hella emotional, and like it felt
20 retaliatory and, you know, just exhausting.

21 Q. And I appreciate you recounting these events for
22 me, I'm sure it's not easy, so I do appreciate
23 you taking the time to be thoughtful about this.

1 A. Yeah.

2 Q. When Officer Skipper walked up to your car after
3 pulling you over, did he give you a reason why he
4 pulled you over, did he state a specific reason?

5 A. No. And I asked him, and he just said -- oh, he
6 did say that my registration was expired or
7 something, and I was like well, how would you
8 know that, and he just sort of was like -- he
9 didn't answer the question. And I was just like
10 okay. Like he didn't really answer anything.
11 Yeah. And I remember being hella, hella like
12 nervous, and the only reason why I felt a tiny
13 bit of relief is because when I was -- while I
14 was pulled over, Natasha happened to walk past
15 because she was walking her dog, and she like
16 stood there and like watched what was happening.

17 Q. And then after you were issued the six tickets,
18 did you speak to Natasha about it or did you
19 drive away?

20 A. Well, I couldn't drive away, he told me my car
21 was being impounded, and I said well, can I just
22 take it home and like park it in my driveway and
23 I won't drive it, and he's like that's not how

1 this works, and I was like well, we were like
2 right in front of where my church is, and I was
3 like well, I could just put it in this parking
4 lot because this is my church and I could leave
5 it here, and he was like no. And so I said
6 well -- I said okay, but I have to like get some
7 stuff out of my car, and so my friend Erin, who
8 lives like kind of around the corner, drove over,
9 and we took all of the stuff out of the car
10 because we were nervous. I was nervous that they
11 were going to like search my car, so we took out
12 all of our like signs, everything that we had
13 from the vigil, all of our BLRR stuff, and put it
14 in Erin's car, and then when I did get back to my
15 car, like two days later or I don't remember, I
16 think it was two days later, it did, in fact,
17 look like someone had searched, like went through
18 my car. Like I had some -- like a book in the
19 back that had been like taken out the back pocket
20 and like thrown in the back seat and you know.

21 Q. So do you believe that BPD officers or a BPD
22 officer went through your car?

23 A. Whether it was BPD, whether it was some city

1 official that worked at the impound, someone did.
2 I was afraid that yes, BPD would go through my
3 car because of the work that we were doing and
4 who we were. Yes.

5 Q. So after your car was towed, did you speak to
6 Natasha about what she witnessed and what you had
7 just gone through?

8 A. After my car was towed, the three of us, Natasha
9 me, and Erin went to dinner.

10 Q. Okay.

11 A. To like just like kind of alleviate stress, we
12 were hella stressed about what happened. I was
13 pretty emotional, Natasha was pretty angry. Erin
14 was just being super supportive, and we didn't
15 really like talk about it or go into any detail
16 about it, we just, you know, were trying to
17 decompress from what had just happened,
18 especially after the weeks and days that we had
19 had, and not even just weeks and days, but like
20 months and years of like organizing against the
21 BPD strike force, the city, like, you know, it
22 all just took a toll, and I think we were just
23 trying to like decompress from the situation that

1 happened.

2 Q. So you mentioned that Officer Skipper referred to
3 the expired registration when he pulled you over,
4 correct?

5 A. Um-hum -- or, I don't know if he exactly said my
6 registration was expired or my plates were
7 expired, which are the same exact thing, but like
8 you know --

9 Q. Okay. So it could have been plates, it could
10 have been registration. If it was expired
11 plates, does that change your belief that he
12 couldn't have seen -- let me rephrase. You were
13 previously confused because he couldn't have seen
14 your registration before pulling you over,
15 correct?

16 MS. EZIE: Object to form.

17 THE WITNESS: No. I'm not saying that I was
18 previously confused because he couldn't see my
19 registration. What I was saying is he wouldn't
20 have had any reason to like search my plates,
21 like why would he have had any reason to search
22 my plates if I didn't violate any traffic
23 violation or anything, so that leads me to

1 believe that he was profiling me or whatever for
2 actually even running my plates.

3 BY MS. FREELY:

4 Q. Okay. I understand your point, thank you for the
5 clarification. In your opinion, would it have
6 been just for him to pull you over because of the
7 dirty license plates?

8 MS. EZIE: Object to form.

9 THE WITNESS: No. No one gets pulled over for a
10 dirty license plate, like it wasn't even -- like
11 it looked like a regular driver's license plate.
12 New York State license plates are white, so if
13 you have a license plate and you live in Buffalo
14 and it snows, and like it's dirty, like your
15 license plate is just going to be dirty, so I
16 don't -- I also feel like if the license plate,
17 if there was something actually wrong with the
18 license plate, like you wouldn't have been able
19 to see letters and/or numbers, you know, like I
20 don't, I don't believe that to be true.

21 BY MS. FREELY:

22 Q. Okay. So just to clarify, you don't believe that
23 pulling over someone for a dirty license plate is

1 a valid reason to pull someone over, correct?

2 A. No.

3 MS. EZIE: Object to form.

4 THE WITNESS: That's not what I'm saying.

5 BY MS. FREELY:

6 Q. Sorry.

7 A. What I'm saying is I don't believe that he had a
8 valid reason to pull me over, I also don't think
9 that he pulled me over for having a dirty license
10 plate. I don't believe that was his intent
11 and/or intention.

12 Q. Okay. And I know we're just getting a little
13 bit -- I just want to make sure we're -- I'm
14 clear on what your testimony is, so excuse me if
15 this is a little bit circular. But so then why
16 do you think -- what led you to believe that he
17 pulled you over strictly to racially profile you?

18 MS. EZIE: Object to form.

19 THE WITNESS: I believe that, I believe that he
20 pulled us over -- me over, because of, one, where
21 I was coming from, and two, the work that we were
22 doing in general, and -- yeah. I don't think
23 that he had a reason -- I'm sure he pulled me

1 over because he did say my plates were expired,
2 but also what I'm saying is he had no reason to
3 run my plates. And so given the fact that he ran
4 my plates, to me, feels like he had already
5 profiled me.

6 BY MS. FREELY:

7 Q. Okay. And let me just see. This was in
8 September, do you remember if you were driving
9 with your window down or your window up by
10 chance?

11 A. I mean, I don't know that I remember, but I
12 probably had my windows up because I never -- I
13 don't really drive with my windows down.

14 Q. Fair enough. And then, were you arrested after
15 this incident, following this incident?

16 A. No.

17 Q. Were you asked to step out of the car before you
18 were told they planned on towing the car?

19 A. I don't recall if I was asked before or after.

20 Q. Okay. And for both of the incidents, the
21 checkpoint incident and the September 13th
22 incident, were you driving your 2012 Volkswagen I
23 believe?

1 MS. EZIE: Object to form.

2 THE WITNESS: The first incident -- can you say the
3 question again?

4 BY MS. FREELY:

5 Q. Yes. Of course. I'll break it up. For the
6 checkpoint incident, when you went through the
7 checkpoint, were you driving your 2012
8 Volkswagen?

9 MS. EZIE: Object to form.

10 THE WITNESS: I don't recall, like what year was it?
11 I don't remember what year.

12 BY MS. FREELY:

13 Q. 2015.

14 A. Oh. Then yes, I was.

15 Q. Okay. And then for the September 13th incident,
16 which occurred in 2018, were you also driving
17 your 2012 Volkswagen?

18 A. Yes.

19 Q. So prior to 2015, had you ever received a traffic
20 ticket before?

21 MS. EZIE: Object to form.

22 THE WITNESS: A traffic ticket, I don't believe so.

23 BY MS. FREELY:

1 Q. Okay. And just so that we're clear, when I refer
2 to traffic tickets I refer to any kind of
3 violation of the Vehicle and Traffic Law, so
4 whether it's a parking ticket or a moving
5 violation or related to registrations,
6 inspections and the vehicle issues. After 2018,
7 after the September 13th, 2018 incident, did you
8 receive any traffic tickets?

9 MS. EZIE: Object to form.

10 THE WITNESS: Okay. So I want to go back because
11 like I have gotten parking tickets.

12 BY MS. FREELY:

13 Q. Okay.

14 A. In like I'm sure like 2016 or whatever. And then
15 prior to 2018, I don't recall, but I'm sure I
16 probably did get parking tickets.

17 Q. Okay. So without the time reference attached to
18 that question, earlier you mentioned that you've
19 received a lot of parking tickets or a decent
20 amount of parking tickets -- excuse me, traffic
21 tickets. Do you remember when those traffic
22 tickets were issued?

23 A. Parking tickets.

1 Q. Parking tickets.

2 A. And do I remember when, you said?

3 Q. Yes.

4 A. I don't remember when, no.

5 Q. Do you remember approximately how many?

6 A. I mean, a lot. Like thousands of dollars of
7 parking tickets.

8 Q. And were those exclusively in the City of Buffalo
9 or --

10 A. Yes.

11 Q. -- any other places as well?

12 A. Exclusively the City of Buffalo.

13 Q. Okay. And can you give a couple examples of
14 reasons for those parking tickets, like wrong
15 side, parked on the wrong side or what were the
16 reasons generally?

17 A. I don't even -- like I remember one time I parked
18 on my street, and there was a part of my street
19 that you could like park from place to the corner
20 and then apparently randomly the city just
21 changed the sign and decided you couldn't park
22 there anymore, so then I remember getting like --
23 and there wasn't, there actually wasn't a sign,

1 but then -- there wasn't a sign when it first
2 started, but then they started handing out
3 tickets, and then maybe like sometime after they
4 put a sign like no parking from here to the
5 corner. And then -- so that's an example. Just
6 like random stuff. My neighborhood, my parents'
7 neighborhood, you -- which is like my permanent,
8 as I said my permanent address, like you couldn't
9 -- started, you couldn't park on the street
10 without having a permit because of the hospital
11 and like hospital employees started parking over
12 there, just like mad random stuff like all the
13 time.

14 Q. And for those tickets in the past, do you
15 normally challenge in court or do you normally
16 just pay them and call it a day?

17 A. A little bit of both.

18 Q. Okay. And what would you say, what's the
19 deciding factor for you between whether you're
20 going to challenge it or whether you're going to
21 pay it?

22 A. I don't know. I think most of it probably is
23 just like time. But also, I think after you

1 challenge a ticket and you still get the verdict
2 is still guilty, it's kind of like what's the
3 point.

4 Q. Have you ever had counsel to represent you in any
5 of the court proceedings where you've challenged
6 your traffic tickets, parking tickets?

7 A. No.

8 Q. And since moving to California, have you received
9 any traffic tickets, parking tickets, any
10 violations of their Vehicle and Traffic Law over
11 there?

12 MS. EZIE: Object to form.

13 THE WITNESS: Since being here I think I got one
14 parking ticket for parking on the street on a
15 Saturday, but I didn't realize that was a thing
16 when I first moved here, so I didn't realize you
17 had to pay a meter on a Saturday, because that's
18 not a thing back home, so --

19 BY MS. FREELY:

20 Q. And did you go to court to challenge that or did
21 you just pay that?

22 A. Well, I just paid that, because I actually was
23 wrong, because I parked on the street --

1 actually, I actually don't know. Oh, I -- one,
2 oh, I got another ticket for parking in front of
3 my house because I was supposed to have a tag,
4 but I challenged that.

5 Q. And how did that --

6 A. Because I did live there.

7 Q. Sorry.

8 A. No. I was just saying because I obviously did
9 live there, and like so I --

10 Q. So for the tag ticket, how did that resolve, did
11 you have to pay or was that thrown out?

12 A. I didn't have to pay.

13 Q. Okay.

14 A. Also in California, you don't -- I just want to
15 say, in Oakland and in the Bay, you don't -- like
16 Oakland PD does not pull folks over for traffic
17 violations. That's not a thing that is here due
18 to like the organizing that has happened out
19 here.

20 MS. FREELY: Okay. That's all the questions I have
21 for today. Ms. Redden, I just want to thank you
22 again for taking the time to be thoughtful about
23 everything today, and I appreciate the anxiety

1 that these events have instilled in you, but I
2 appreciate your thoughtful testimony today.

3 THE WITNESS: Thank you.

4 MS. EZIE: Thanks so much. I don't have a lot, but I
5 do have a little bit of re-direct.

6 MS. FREELY: Go for it.

7 MS. EZIE: Okay.

8

9 EXAMINATION BY MS. EZIE:

10

11 Q. So, Ms. Redden, earlier you testified that you
12 visited Buffalo eight or nine times since your
13 2020 move to Oakland. Do you recall that?

14 A. Yes.

15 Q. Approximately how long were your visits to
16 Buffalo typically?

17 A. Generally when I come to Buffalo, I probably stay
18 -- each time I probably stay at least two weeks
19 because I feel like, I feel like it's too far to
20 come all the way from over here back home to not
21 stay for a long period of time. So yeah. Like
22 two to three weeks each visit.

23 Q. Got it. So that averages out to spending four to

1 six weeks in Buffalo every year?

2 A. Yeah. I would say that's right.

3 Q. Okay. And earlier you were asked whether you
4 drove during your Buffalo visits. Do you recall
5 that?

6 A. Yes.

7 Q. And what was the answer to that question?

8 A. When I am in town I do -- I drive my dad's car
9 was the answer.

10 Q. Okay. And how did driving in the City of Buffalo
11 make you feel as far as the BPD are concerned?

12 MS. FREELY: Objection to form.

13 BY MS. EZIE:

14 Q. You may answer.

15 A. I would say I think any time I drive at home I
16 get hella anxious and nervous, because I think
17 there's always the potential that I will be
18 pulled over, so I just feel like hella anxiety,
19 you know, and a little fearful. Buffalo is a
20 small place, you know, so it's just like you -- I
21 don't know. It just feels like you make a
22 ruckus, people are going to know who you are,
23 people are going to know like what you've done or

1 what you do, and so it just makes me nervous
2 anyway, although I feel like, you know, we've
3 done great work in all the things, but I feel, I
4 do feel anxiety.

5 Q. Now, since moving to Oakland, have you driven in
6 Oakland?

7 A. Yes.

8 Q. How do you find driving in Oakland in comparison
9 to driving in Buffalo?

10 MS. FREELY: Objection to form.

11 THE WITNESS: I mean, it's interesting, I think
12 although I just testified that Oakland PD does
13 not pull over folks for traffic violations, which
14 is true, like it's not a thing that they do, and
15 I have never been pulled over in Oakland. I
16 still, I still feel -- it's not funny, but I
17 still feel hella anxious just like when I see
18 cops or like when they're behind me, I just get
19 really nervous. Because I'm always like, you
20 know, what's happening, why are they behind me,
21 are they going to keep following me, are they
22 going to pull me over, like I have all these
23 questions in my head all the time, which is like,

1 you know, which is hard, right, because I
2 actually do like really suffer from anxiety, and
3 so it's just, it is a lot. I'm trying to like,
4 you know, I know that that's not a thing here,
5 but I still get really anxious about it.

6 BY MS. EZIE:

7 Q. When do you think -- what prompted you to first,
8 if you can think all the way back to when you
9 first started noticing this feeling, what
10 prompted you to start feeling anxious around law
11 enforcement while driving?

12 A. I mean, I think initially like when I was like
13 younger and stuff and growing up in Buffalo for
14 real, like I never really felt any sort of way
15 about driving around and like police interactions
16 because it never really felt like it was a thing,
17 but when I moved back in 2012, it just felt like
18 there was just a big -- like a shift, you know
19 what I mean, like there was a higher police
20 presence. I did feel like I was being followed
21 or that there was the potential for me to be
22 pulled over, so I think once I just started to
23 feel more of the police presence is when like my

1 anxiety started.

2 Q. And how would you describe your interactions with
3 Buffalo Police from 2011 to present --

4 MS. FREELY: Objection.

5 BY MS. EZIE:

6 Q. -- how have they made you feel?

7 MS. FREELY: Sorry. I didn't mean to interrupt you.

8 THE WITNESS: I mean, you know, BPD, they -- I mean,
9 they, they can be scary, like they really be
10 acting like, like cowboys or something or like
11 you just can't say no to them or you can't like
12 talk to them or, you know, it's just, it's just
13 hella bizarre, like, you know, it is, it's like
14 law and order to like mini levels of degrees
15 higher than like any other interaction, and yeah,
16 it's just wild. It's like can't even ask a
17 question, it's like why would you ever think you
18 have the authority to ask me a question, you
19 know, and that's, that's wild.

20 BY MS. EZIE:

21 Q. Now, I want to turn to some questions you were
22 asked about your checkpoint stop in September
23 2015. Now, do you recall being asked about the

1 race of motorists that were stopped alongside you
2 at the checkpoint you encountered on September
3 9th --

4 A. Yes.

5 Q. -- 2015? Okay. What race were the motorists
6 that you saw stopped at the checkpoint?

7 A. They were black.

8 Q. Did you see any white motorists stopped at the
9 checkpoint?

10 A. No.

11 Q. Now, how were you able to discern the race of the
12 motorists that -- as in how did you view the race
13 of the motorists who were stopped alongside of
14 you at the checkpoint?

15 A. Yeah. I think some, like I said, were pulled
16 over and asked to get out. I think some folks
17 when interacting with the police, you can like
18 see their head and/or their hands, stuff like
19 that.

20 Q. Okay. And so -- so you were asked about whether
21 you could see through the windows, presumably the
22 front and rear windshields of all the cars
23 stopped at the checkpoints. Do you remember

1 that?

2 A. Yes.

3 Q. In your opinion, are windshields the only way
4 that you can perceive the race of a motorist?

5 A. No.

6 Q. And so remind us what were some of the ways that
7 you were able to perceive the race of the
8 motorists.

9 A. Yeah. Like I said, like people's hands, I think
10 like hair, but also, you know, when someone is
11 talking, you can like see them pushing their head
12 like out of the window.

13 MS. EZIE: Okay. If I could just briefly confer with
14 my colleague Mikaila in a breakout room, I think
15 we might be done. We'll be right back.

16 (Whereupon, a short recess was then taken.)

17 BY MS. EZIE:

18 Q. Back on the record. I have just a few more
19 questions. Now, Ms. Redden, during the course of
20 the deposition today, you were asked about stops
21 and tickets that you received as described in the
22 complaint. Do you recall that?

23 A. Yes.

1 Q. And you were also asked about whether you'd had
2 any police stops or interactions that were not
3 outlined in the complaint. Do you recall that?

4 A. Yes.

5 Q. And do you recall describing several instances
6 where you were followed by law enforcement?

7 A. Yes.

8 Q. And do you recall describing an instance where as
9 you were parking outside of your then residence,
10 you were questioned by cops from the Buffalo
11 Police Department?

12 A. Yes.

13 Q. Do you believe any of those to be instances of
14 racial discrimination or profiling?

15 A. Yes.

16 Q. Can you describe in your own words why?

17 A. Yeah. I mean, I would say that they were racial
18 profiling because I, a black woman, was crossing
19 over from a poor black neighborhood into a more
20 affluent predominantly white neighborhood in
21 Buffalo, and, you know, I feel like I was being
22 followed because, you know, why would I be over
23 there or I possibly couldn't like have been over

1 there or live over there or, you know, I
2 shouldn't be over there.

3 Q. And in your own words, what is the importance of
4 this lawsuit for the City of Buffalo and its
5 residents?

6 A. Yeah. I mean, I think, one, the importance of
7 the lawsuit is, you know, shifting the immediate
8 conditions of the folks, black folks in the city,
9 right, of like they won't be feeling like they
10 are being harassed, profiled by, you know, BPD
11 practicing unconstitutional like practices or
12 unjust practices, and so I think that that is
13 very significantly important. And then two, I
14 think it'll also stop folks who are also poor,
15 working class folks, from like exacerbating their
16 finances, like I've known folks who have
17 literally been arrested because they couldn't pay
18 parking tickets, so I think that's another aspect
19 of like shifting the material conditions of
20 folks, but then two, you know, I think it just
21 means a lot to actually be shifting the culture
22 of a city that is hella segregated, hella poor,
23 and operates -- you know, operates on a level

1 that's like racist and capitalistic, and I think
2 that this will also hopefully be a culture shift
3 in the city. And then also, I think that, you
4 know, there needs to be definitively something
5 said that BPD will actually not be practicing and
6 doing checkpoints, that it is actually illegal,
7 unconstitutional for them to be engaging in this
8 process, so --

9 MS. EZIE: Thank you so much. No more questions.

10

11 RE-EXAMINATION BY MS. FREELY:

12

13 Q. I have one follow-up -- well, one topic to follow
14 up. Ms. Redden, with respect to the September
15 9th, 2015 checkpoint, I'd like you to clarify
16 something for me. So we've already established
17 that there were four cars in front of you when
18 you pulled up to the checkpoint, correct?

19 A. Yes.

20 Q. So when you pulled up to the checkpoint, was that
21 the point in time where you saw others pulled
22 over to the side of the road?

23 A. Versus?

1 Q. Versus did you see them when you first pulled up
2 or did you see them when you got to the front of
3 the checkpoint is my question.

4 A. Well, I saw cars ahead of me when I first pulled
5 up, but then like being able to see people is
6 when I got to the front of the checkpoint.

7 Q. Okay. And so you were able to identify the races
8 -- or, the race, excuse me. Of the individuals
9 who were pulled over on the side of the road when
10 you got to the front of the line, correct?

11 A. Yeah. Because there were, there was more than
12 one officer as well, so yeah.

13 Q. Okay. And as for the four cars that were in
14 front of you when you pulled up to the
15 checkpoint, did all of them get pulled over or
16 did some of them get through without being pulled
17 over?

18 MS. EZIE: Object to form.

19 THE WITNESS: Some of them got pulled over, and then
20 some of them were like talked to.

21 BY MS. FREELY:

22 Q. And so of those four cars, is it correct that
23 your testimony was that you don't recall being

1 able to identify the races of the individuals in
2 all four of those cars in front of you?

3 MS. EZIE: Object to form.

4 THE WITNESS: I think my testimony was that I wasn't
5 able to see all the way through the windshield to
6 the front of the four cars in front of me.

7 BY MS. FREELY:

8 Q. So could you identify the races of the drivers of
9 those four cars?

10 A. Are you asking if I could -- I just want to go
11 back, because initially the question was could I
12 identify them by looking through the windshield
13 of the car, through the cars, and now you're
14 asking me was I able to identify the race of the
15 folks in the car in general?

16 Q. So yes, my question is, could you identify the
17 races of the four cars who were lined up in front
18 of you when you got to the checkpoint?

19 A. Got it. I think during the duration of the
20 checkpoint there were moments where I could see
21 and/or identify that the folks that were either
22 pulled over and/or stopped were black, yes.

23 Q. So --

1 A. But not through looking through the windshield,
2 but by like interactions -- sorry. But by
3 interactions with the police, and/or them being
4 pulled over.

5 Q. Understood. So I just want to make a
6 distinction. Aside from the people who were
7 pulled over, not counting them, could you tell
8 that all four cars in front of you, the races of
9 all four drivers of the cars in front of you,
10 could you tell what races they were?

11 A. Yes.

12 Q. And how could you tell that?

13 A. Through -- and you said, and this is eliminating
14 the folks who were pulled over, but through
15 interactions with police?

16 Q. Yes.

17 A. So like a hand and/or a head.

18 Q. So could you ever see their full faces?

19 MS. EZIE: Object to form.

20 THE WITNESS: I don't recall, I don't recall seeing a
21 person's full face, but I recall like potentially
22 like periphery and/or hands. Does that make
23 sense?

1 BY MS. FREELY:

2 Q. When you say peripheral, do you mean like a side
3 profile?

4 A. Um-hum.

5 MS. FREELY: Okay. That's all the questions I have.
6 I appreciate it.

7 THE WITNESS: Um-hum.

8 MS. EZIE: All right. Thank you, everyone. We would
9 like to read and sign.

10 MS. FREELY: Off the record.

11 (Discussion off the record.)

12

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1 I HEREBY CERTIFY that I have read the
2 foregoing 109 pages and that, except as to those
3 changes set forth in the attached errata form(s),
4 they are a true and accurate transcript of the
5 testimony given by me in the above-entitled
6 action on September 6, 2023.

7
8
9
10 -----
11 SHAKETA REDDEN
12
13

14 Sworn to before me this

15
16 ----- day of ----- 2023.
17

18
19 -----
20 Notary Public.
21
22
23

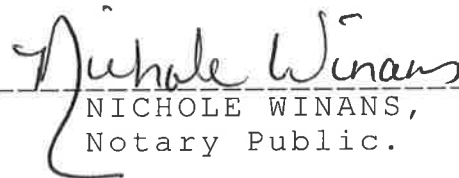
1 STATE OF NEW YORK)

2 SS:

3 COUNTY OF ERIE)

4
5 I, Nichole Winans, a Notary Public in and
6 for the State of New York, County of Erie, DO
7 HEREBY CERTIFY that the testimony of SHAKETA
8 REDDEN was taken down by me in a verbatim manner
9 by means of Machine Shorthand, on September 6,
10 2023. That the testimony was then reduced into
11 writing under my direction. That the testimony
12 was taken to be used in the above-entitled
13 action. That the said deponent, before
14 examination, was duly sworn by me to testify to
15 the truth, the whole truth and nothing but the
16 truth, relative to said action.

17 I further CERTIFY that the above-described
18 transcript constitutes a true and accurate and
19 complete transcript of the testimony.

20
21 
22 _____
23 NICHOLE WINANS,
Notary Public.

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